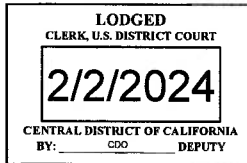


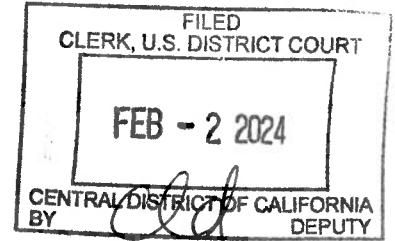
AO 91 (Rev. 11/11) Criminal Complaint (Rev. by USAO on 3/12/20)

☐ Original ☐ Duplicate Original

UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America

v.

SYNIA ZHANE SLATER,

Defendant

Case No. 2:24-mj-00612-DUTY

**CRIMINAL COMPLAINT BY TELEPHONE
OR OTHER RELIABLE ELECTRONIC MEANS**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date of ^{January 20,} ~~February 2,~~ 2024 in the county of Los Angeles in the Central District of California, the defendant violated:

Code Section

18 U.S.C. § 111(a)(1):

Offense Description

Assault of a Federal Employee

This criminal complaint is based on these facts:

Please see attached affidavit.☒ Continued on the attached sheet.

/s/

Complainant's signature

USPIS Inspector Gabriel Rodriguez

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date:

2/2/2024
*Judge's signature*City and state: Los Angeles, CaliforniaHon. Jaqueline Chooljian, U.S. Magistrate Judge*Printed name and title*

AUSA: Kelly Larocque (x3308)

AFFIDAVIT

I, Gabriel Rodriguez, being duly sworn, declare and state as follows:

I. PURPOSES OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against SYNIA ZHANE SLATER ("SLATER") for a violation of Title 18, United States Code, Section 111(a)(1): Assault of a Federal Employee.

2. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF AFFIANT

3. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been so employed since February 2016. I am currently assigned to the Los Angeles Division, San Bernardino Mail Theft Team, which investigates crimes against the United States Postal Service ("USPS"), including its employees, and crimes related to the misuse and attack of the mail system.

4. I graduated from the USPIS's Federal Law Enforcement Training Academy in Potomac, Maryland. In addition, I have received both formal and informal training from the USPIS regarding mail and identity theft investigations, and violent crime investigations.

5. My responsibilities include investigating crimes against the USPS and its employees, and crimes related to the misuse and attack of the mail system, including: theft of United States mail ("U.S. Mail"); possession of stolen U.S. Mail; crimes related to the use, theft, and counterfeiting of postal keys (referred to as "arrow keys") and locks; access device fraud; bank fraud; identity theft; and violent crimes against the USPS or its employees, such as threats and assaults.

III. SUMMARY OF PROBABLE CAUSE

6. On January 20, 2024, a USPS employee ("victim K.K.") was working after-hours when she encountered SLATER filling a large parcel bag with several UPS and FEDEX packages. Once confronted, SLATER left the post office onto the back loading dock within the employee parking lot. After several minutes of asking SLATER to leave, victim K.K. attempted to escort SLATER off the property. SLATER then became combative and punched victim K.K. several times in the face. Surveillance footage captures the incident.

7. Officers responded and located SLATER just south of the post office. They placed SLATER under arrest and victim K.K. confirmed that SLATER was her assailant. Victim K.K.

suffered bruising and swelling around her right eye and scratches to her neck area.

IV. STATEMENT OF PROBABLE CAUSE

8. Based on my review of law enforcement reports, conversations with other law enforcement officers, and my own knowledge of the investigation, I am aware of the following:

9. On Saturday, January 20, 2024, at about 7:30 PM, victim K.K. was on duty, in uniform, and working as a supervisor at the Northpark Post Office in San Bernardino, California. According to victim K.K., the post office had already been closed to the public, and she was inside closing up for the day.

10. Around this time, victim K.K. heard a noise. According to victim K.K., she walked toward the noise and saw a woman later identified as SLATER grabbing several UPS and FEDEX parcels that were in the care of the USPS for delivery and placing them into a large parcel bag. SLATER was inside an interior hallway, between two sets of double doors, connecting the outside loading dock to the warehouse area of the post office. Surveillance footage shows SLATER entering this area from the loading dock, which is within the employee parking lot in the back of the post office. According to law enforcement reports, the lot is secured by a chain link fence with barbed wire on top and a sliding gate. Next to the gate, there are signs marked "Authorized Personnel Only" and "Unauthorized Persons Prohibited."

11. According to victim K.K., she confronted SLATER and repeatedly asked her to leave. SLATER claimed to work for

FEDEX. (According to FEDEX corporate security, SLATER was not an employee.) SLATER finally exited the hallway through the double doors onto the loading dock.

12. According to victim K.K., after several minutes of asking SLATER to leave, victim K.K. attempted to escort SLATER off the property, consistent with victim K.K.'s official duties as a USPS employee. SLATER then became combative and punched victim K.K. several times in the face. Victim K.K. pushed SLATER back and held her against a gate to defend herself. Victim K.K. then went inside the post office and called 911. Shortly thereafter, SLATER left the premises. Surveillance footage confirms victim K.K.'s explanation of what occurred.

13. According to law enforcement reports, officers responded and located a person matching the suspect's description (later identified as SLATER) just south of the post office. Officers placed SLATER under arrest. According to the officers, SLATER was combative and resisted.

14. According to law enforcement reports, shortly after the incident and arrest, the officers performed what is referred to as an "infield show-up," during which they had victim K.K. look at SLATER; victim K.K. confirmed that SLATER was her assailant.

15. I reviewed photographs of victim K.K. that were taken one and two days after the assault, and saw that victim K.K. suffered bruising around her right eye and scratches on her neck area. I met with victim K.K. on January 23, 2024---three days

after the assault---and saw that victim K.K. still had swelling and bruising around her right eye.

V. CONCLUSION

16. For all of the reasons described above, there is probable cause to believe that SLATER has committed a violation of Title 18, United States Code, Section 111(a)(1), Assault of a Federal Employee.

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this 2nd day of February, 2024.



THE HONORABLE JACQUELINE CHOOLJIAN
UNITED STATES MAGISTRATE JUDGE